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*Attorneys for Defendants:
IRVING J. PINTO 1996 GRANTOR RETAINED
ANNUITY TRUST; IRVING J. PINTO 1994
GRANTOR RETAINED ANNUITY TRUST;
SIDNEY KAPLAN, in his/her capacity as Trustee
of the Irving J. Pinto 1996 Grantor Retained
Annuity Trust and the Irving J. Pinto 1994
Grantor Retained Annuity Trust; ESTATE OF IRVING
J.PINTO; and JAMIE PINTO, in his capacity as
Personal Representative of the Estate of Irving J. Pinto.*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.
IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,
Plaintiff,
v.
IRVING J. PINTO 1996 GRANTOR RETAINED ANNUITY TRUST; IRVING J. PINTO 1994 GRANTOR RETAINED ANNUITY TRUST; SIDNEY KAPLAN, in his/her capacity as Trustee of the Irving J. Pinto 1996 Grantor Retained Annuity Trust and the Irving J. Pinto 1994 Grantor Retained Annuity Trust; ESTATE OF IRVING J.PINTO; and JAMIE PINTO, in his capacity as Personal Representative of the Estate of Irving J. Pinto,
Defendants.

Adv. Pro. No. 10-04744 (SMB)

**CERTIFICATE OF NO OBJECTION OF APPLICATION OF DEFENDANTS'
COUNSEL ROBERT M. McCLAY AT THE LAW FIRM OF McCLAY•ALTON,
P.L.L.P. AND DEFENDANTS' COUNSEL MARVIN C. INGBER FOR AN ORDER
PURSUANT TO RULE 2090-1(e) OF THE LOCAL BANKRUPTCY RULES TO
WITHDRAW AS COUNSEL TO DEFENDANTS**

Defendants IRVING J. PINTO 1996 GRANTOR RETAINED ANNUITY TRUST;
IRVING J. PINTO 1994 GRANTOR RETAINED ANNUITY TRUST; SIDNEY KAPLAN, in
his/her capacity as Trustee of the Irving J. Pinto 1996 Grantor Retained Annuity Trust and the
Irving J. Pinto 1994 Grantor Retained Annuity Trust; ESTATE OF IRVING J.PINTO; and
JAMIE PINTO, in his capacity as Personal Representative of the Estate of Irving J. Pinto
("Defendants"), by and through their undersigned counsel, Robert M. McClay, McClay•Alton,
P.L.L.P. and Marvin C. Ingber ("Counsel for Defendants") submit this certificate pursuant to the
United States Bankruptcy Court, Southern District of New York, Local Bankruptcy Rule 9075-2,
and respectfully represent:

1. On March 7, 2016, Counsel for Defendants filed the *Application of Defendants' Counsel Robert M. McClay at the Law Firm of McCLAY•ALTON, P.L.L.P. and Defendants' Counsel Marvin C. Ingber for an Order Pursuant to Rule 2090-1(e) of the Local Bankruptcy Rules to Withdraw as Counsel to Defendants* (the "Application") (08-01789, ECF No. 12780; 10-04744 ECF No. 50).

2. The deadline for filing objections to the Application expired on March 28, 2016 at 4:00 p.m. prevailing Eastern time. A hearing on the Application has been scheduled for March 31, 2016 at 12:00 p.m. prevailing Eastern time.

3. Notice of the Application was provided by U.S. Mail, postage prepaid or email to:
- a. Defendant Jamie Pinto;
 - b. Trustee c/o Marc E. Hirschfield, Esq., Marc F. Skapof , Esq., Dean Hunt, Esq. and Farrell A. Hochmuth, Esq.;
 - c. All parties included in the Master Service List as defined in the Order Establishing Notice Procedures and Limiting Notice dated November 5, 2011 (ECF No. 4560);
 - d. All parties that have filed a notice of appearance in this case: Kevin H. Bell, Esq. with Securities Investor Protection Corporation.

4. Counsel has reviewed the Court's docket not less than forty-eight (48) hours after expiration of the time to file an objection, and to date, no objection, responsive pleading, or request for a hearing with respect to the Application appears thereon. Additionally, no party has indicated to the Counsel for Defendants that it intends to oppose the relief requested in the Application.

5. An electronic copy of a proposed order (the "Order"), substantially in the form of the proposed order annexed to the Application will be submitted to the Court, along with this Certificate.

6. Pursuant to United States Bankruptcy Court, Southern District of New York Local Bankruptcy Rule 9075-2, Counsel for Defendants respectfully requests that the Order be entered

without a hearing.

Dated: St. Paul Minnesota

March 30, 2016

By: /s/ Robert M. McClay
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Dated: Palm Springs, CA

March 30, 2016

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and the Irving J. Pinto 1994 Grantor Retained
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